

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara L. Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge


February 18, 2025

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**

Re: **United States v. Jose Rivera**
24 Cr. 222 (JGK)

2/19/25

John G. Koeltl, U.S.D.J.

Dear Judge Koeltl,

Mr. Rivera pled guilty before Your Honor on December 10, 2024. At that hearing, the Court continued Mr. Rivera's bail and scheduled sentencing for March 25, 2025.

We write to respectfully request that the Court modify Mr. Rivera's bail package to replace the condition of "home detention" with "curfew enforced by location monitoring, with the hours to be set by Pretrial Services." Pretrial Services by Officer Jonathan Lettieri consents to this request. The government by Assistant United States Attorney James Mandilk opposes this application.

Mr. Rivera has been on home detention for more than 11 months. Officer Lettieri informs me that Mr. Rivera has been in perfect compliance with his conditions to date, and that Mr. Rivera is working and attending programming. The requested bail modification would give Mr. Rivera a little more flexibility as his sentencing date approaches – particularly in terms of visiting with his children. Pursuant to the Bail Reform Act, Mr. Rivera should be subject to the least restrictive conditions necessary. See 18 U.S.C. § 3142(c). Therefore, we think this is an appropriate application, even though Mr. Rivera's sentencing is approaching.

Thank you for your consideration.

Respectfully submitted,

/s/
Sylvie Levine
Mitchell Schwartz
Attorneys for Mr. Rivera